

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DORMAN ANGEL, <u>et al.</u>,	::	CASE NO. C-1-01 467
Plaintiffs	::	JUDGE: BECKWITH
vs.	::	MAGISTRATE JUDGE: BLACK
UNITED PAPERWORKERS	::	
INTERNATIONAL UNION		
(PACE) LOCAL 1967, <u>et al.</u>		
	::	
Defendants	::	
	:: :: :: :: ::	

**DEFENDANT PAPER, ALLIED INDUSTRIAL, CHEMICAL
& ENERGY WORKERS UNION, AFL-CIO S
WITNESS IDENTIFICATION**

Defendant, Paper, Allied Industrial, Chemical & Energy Workers Union, AFL-CIO, identifies the following witnesses expected to testify at trial, all of whom have been deposed and all of whom can be contacted at the PACE office, 660 Northland Road, Cincinnati, Ohio:

Gerald Johnston, Regional Director, International Vice President, and member of the Executive Board, who will testify on the history of the Mill and on his involvement in the 2001 plant closing negotiations;

Ken Stanifer, International Representative, who will testify on the collective bargaining agreements for the Mill, on 2001 negotiations, on the plant closing agreement and on negotiations with the successor employer;

Tim Bray, former President of the Local, who will testify on the operations of the Mill, on the plant closing agreement, and on the collective bargaining agreements;

In addition, Defendant will call Annetta Johnson (if available), former personnel director for the facility; she will, if available, testify about collective bargaining agreements and about negotiation of the plant closing agreement. It is the understanding of Defendant that she is in North Carolina and is no longer employed by International Paper.

Respectfully submitted,

s/James B. Robinson

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of November, 2004, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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I also certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

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